Department of Toxic Substances Control

Maureen Gorsen, Director
700 Heinz Avenue
Berkeley, California 94710-2721

Linda S. Adams
Secretary for
Environmental
Protection

Arnold Schwarzenegger
Governor

April 24, 2008

Mr. James B. Sullivan
BRAC Environmental Coordinator
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

DRAFT FINAL STATUS SURVEY REPORT FOR BUILDING 343, NAVAL STATION TREASURE ISLAND (NSTI), SAN FRANCISCO, CALIFORNIA.

Dear Mr. Sullivan:

The Department of Toxic Substances Control (DTSC) staff completed its review of the *Draft Final Status Report for Building 343, Treasure Island, San Francisco, California,* dated April 7, 2008 (Report). Building 343 is a one-story metal building located at NSTI on the eastern portion of Treasure Island in the block bordered by Avenues M and N and 5th and 8th Streets. Building 343 is currently not in use, but the building was used by the Navy as a part of the Radiation Detection, Indication and Computation Maintenance Calibration School. Past uses included training personnel in the use and calibration of radiation detection equipment between the early 1950s to the 1970s as well as storage of radiological sources for training into the early 1990s. The purpose of the Report is to document the procedures and results of the final status surveys performed in Room 101 of Building 343.

The Report states that the Radiological Affairs Support Office (RASO) collected 172 wipe samples in Building 343 in 1993 and detected six locations where alpha ($\propto$) wipes were above the lower limit of detection (LLD). Two wipes, which were also detected above release limits, were located on a counter top in the storeroom (Room 101). The other four, which were below the $\propto$ release limit, had two located in the shelves of Room 101, one on the floor in the restroom, and one in a drawer in the Chemical, Biological, Radiological Defense Laboratory. These areas were then decontaminated by the Naval Technical Training Center using commercial decontamination spray foam. RASO conducted subsequent analyses and determined that all six locations had less than the LLD for both alpha ($\propto$) and beta (β) isotopes. An additional 95 wipes were forwarded to RASO for alpha ($\propto$), beta

(β), and gamma (γ) analyses for the remainder of Building 343 in July 1993. Two of the ∝ wipes, locations not specified, were above the LLD of detection of 2.1 disintegrations per minute (dpm) but below the release limit. All β wipes were less than or equal to the LLD of 92 dpm, and no γ isotope detections exceeded natural background levels. Based on the previous activities performed, a final status survey of Building 343, Room 101 was conducted and the Report documents that survey.

Based on our review, DTSC has the following comments to the Report:

- The Report should be modified to clarify that the currently proposed "release to unrestricted use" can only be applied with respect to radiological matters.

- Text in the Executive Summary as well as Section 2.1 (Previous Surveys) describe at least three previous wipe sampling events in Building 343. Figures of the locations of the previous wipe sample locations along with the data in tables must be included to demonstrate if the building in its entirety has been adequately sampled for radiological isotopes. For example, it is unclear if any wipe samples have been collected from within the air ducts and /or the sink and sewer drains. If these have not been sampled to date, an explanation should be provided in the Report. The historical sampling information and data will also help to provide a clearer justification for the focused final status survey of Room 101 documented in the current Report. The complete Building 343 dataset must be included in order to evaluate it for unrestricted use (not just Room 101 of Building 343).

- Section 8.0 – Survey Procedures and Measurement Data Interpretation. The text states that the survey procedures described were performed in accordance with the subcontractor's approved standard operating procedures. Was this approval from the Department of Health Services? DTSC? Please clarify.

- Section 11.0 – Conclusion.
  = Paragraph one. Additional information such as previous sampling figures and survey results are needed to provide support for the statement that Room 101 is "the only potentially contaminated room in Building 343." The statement without additional support appears to be in conflict with the previous detections, subsequently remediated, on the floor in the restroom, and a drawer in the Chemical, Biological, Radiological Defense Laboratory.
  = Last paragraph. The text states that Room 101 of Building 343 "residual radioactivity meets the stated release criteria" and "is ready for unconditional unrestricted use." Please clarify that based on the results of the final status survey of Room 101 as well as the previous surveys taken throughout Building 343, the Navy is seeking regulatory concurrence for release to unrestricted use of the entire Building 343 (not just Room 101 of Building 343).

The California Department of Public Health will be reviewing the document and submitting comments under a separate cover. If you have any questions, please contact me at (510) 540-3775.

Sincerely,

Ryan Miya

Ryan Miya, Ph.D.
Senior Hazardous Substances Scientist
Brownfields and Environmental Restoration Program

Copies with sent via email transmission followed by hard copy.

cc: Mr. Charles Perry
Lead Remedial Project Manager
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310
charles.l.perry@navy.mil

Mr. Scott Anderson
Remedial Project Manager
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310
scott.d.anderson@navy.mil

Ms. Christine Katin
Remedial Project Manager
(SFD-8-1)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105
Katin.Christine@epamail.epa.gov

cc continued on the following page:

cc continued:

Mr. Paisha Jorgensen, PG
Engineering Geologist
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612
pjorgensen@waterboards.ca.gov

Mr. Jack Sylvan
Treasure Island Redevelopment Project Manager
Mayor's Office of Base Reuse and Development
City Hall, Room 436
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102
jack.sylvan@sfgov.org

Ms. Mirian Saez
Director of Island Operations
Treasure Island Development Authority
410 Avenue of the Palms
Building 1, 2nd Floor
San Francisco, California 94130
mirian.saez@sfgov.org

Mr. Gary R. Foote
Principal Geologist
Geomatrix Consultants, Incorporated
2101 Webster Street, 12th Floor
Oakland, California 94612
gfoote@geomatrix.com

Mr. Pete Bourgeois
CERCLA Program Project Manager
Shaw Environmental, Incorporated
Building 670
570 Avenue M
San Francisco, California 94130
peter.bourgeois@shawgrp.com

Ms. Tracy M. Jue, M.S.
Department of Public Health
Environmental Management
1616 Capital Avenue, MS 7405
Sacramento, CA 95899-7377
Tracy.Jue@cdph.ca.gov